

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

PRECISION ASSOCIATES, INC., *et al.*,

Plaintiffs,

-against-

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., *et al.*,

Defendants.

Case No. CV 08 0042-JG-VVP

**DEFENDANT HELLMANN WORLDWIDE LOGISTICS GMBH & CO. KG'S
JOINDER IN DEFENDANT DACHSER GMBH & CO. KG I/S/H/A DACHSER
INTELLIGENT LOGISTICS' OBJECTION TO THE DISCLOSURES OF DOCUMENTS
RELATING TO FOREIGN INVESTIGATIONS**

Richard A. Walker
KAPLAN, MASSAMILLO & ANDREWS, LLC
200 W. Madison Street, 16th Floor
Chicago, Illinois 60606
Tel: (312) 345-3000
Fax: (312) 345-3119
rwalker@kmalawfirm.com

*Attorneys for Defendants,
Hellmann Worldwide Logistics GmbH & Co. KG*

JOINDER IN OBJECTIONS

Defendant Hellmann Worldwide Logistics GmbH & Co. KG (“Hellmann GmbH”) is organized and exists under the laws of Germany, and is located in Germany. Hellmann GmbH was investigated by the European Commission (“EC”). Responses to the EC are subject to local laws which deem all submissions confidential and preclude disclosure of personal data, including employee names.

Hellmann GmbH joins in Defendant Dachser GmbH & Co. KG I/S/H/A Dachser Intelligent Logistics’ Objection to the Disclosures of Documents Relating to Foreign Investigations (D.E. 975) together with the supporting Memorandum (D.E. 975-1) and adopt, for the purposes of this Motion all arguments and law, affirmations and exhibits contained therein relating to Arguments 1 and 3 relating to European Commission confidentiality and the German Federal Data Protection Act; and incorporate these by reference as though fully set forth herein.

WHEREFORE, Defendant Hellmann Worldwide Logistics GmbH & Co KG respectfully requests an Order that such documents and information are deemed confidential and protected from disclosure and shall not be produced in this action.

December 20, 2013

KAPLAN, MASSAMILLO & ANDREWS, LLC

By: /s/ Richard A. Walker

Richard A. Walker
200 W. Madison Street, 16th Floor
Chicago, Illinois 60606
Tel: (312) 345-3000
Fax: (312) 345-3119
rwalker@kmalawfirm.com

*Attorneys for Defendants,
Hellmann Worldwide Logistics GmbH & Co. KG*

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2013, a true and correct copy of Defendant HELLMANN WORLDWIDE LOGISTICS GMBH & CO. KG' JOINDER IN DEFENDANT DACHSER GMBH & CO. KG I/S/H/A DACHSER INTELLIGENT LOGISTICS' OBJECTION TO THE DISCLOSURES OF DOCUMENTS RELATING TO FOREIGN INVESTIGATIONS was filed and served on all parties of record via the Court's ECF system.

By: /s/ Richard A. Walker
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Chicago, Illinois 60606
Tel: (312) 345-3000
Fax: (312) 345-3119
rwalker@kmalawfirm.com

*Attorney for Defendant
Hellmann Worldwide Logistics GmbH & Co. KG*